

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

**Chapter 7 Bankruptcy
Bky 04-327235 (GFK)
Adv. 04-3326**

Bradley R. Thayer and Judith N. Thayer,

Debtors.

In re:

Kristen Thayer,

Plaintiff,

v.

Bradley R. Thayer,

Defendant.

ANSWER OF BRADLEY R. THAYER

Defendants, Bradley R. Thayer (“Brad Thayer”), his Answer to the Adversary Complaint of Kristen Thayer, admits, denies, and qualifies as follows:

Brad Thayer denies each and every allegation, matter, and thing as set forth in Plaintiff’s Adversary Complaint (the “Complaint”) except as specifically admitted or otherwise qualified herein.

1. As to the allegations contained in Paragraph 1 of the Complaint, Brad Thayer admits such allegations.

2. As to the allegations contained in Paragraph 2 of the Complaint, the Brad Thayer admits such allegations.

3. As to the allegations in Paragraph 3 of the Complaint, Brad Thayer admits such allegations.

4. As to the allegations in Paragraph 4 of the Complaint, Brad Thayer admits such allegations.

5. As to the allegations in Paragraph 5 of the Complaint, Brad Thayer admits such allegations to the extent that the court order in question speaks for itself.

6. As to the allegations contained in Paragraph 6 of the Complaint, Brad Thayer admits such allegations.

7. As to the allegations contained in Paragraph 7 of the Complaint, Brad Thayer admits that the debt described in the Complaint has not been satisfied as of the date of the commencement of his Chapter 7 case and he alleges that the court order in question speaks for itself.

8. As to the allegations contained in Paragraph 8 of the Complaint, Brad Thayer denies such allegations and alleges that Plaintiff will not be unfairly treated and that Brad Thayer will not be unjustly enriched.

WHEREFORE, Defendants, Bradley R. Thayer, prays for judgment against Plaintiff, Kristen Thayer, as follows:

- 1) Ordering that the Defendant's objections to Plaintiff's claims be sustained and that such claims be disallowed;
- 2) Denying Plaintiff's request for an exception to discharge under be denied and granting an order discharging Plaintiff's claims;
- 3) Such other and further relief as the Court deems just and equitable.

Respectfully submitted,

THE OLIVER GROUP, PLC

Dated: 7 September 2004

/s/ *Karl A. Oliver*

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